

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY CASES

Master Docket No.12-12052-FDS

This Document Relates To:

RAYMOND MCDOW and ROSEANNE
BROOKS, individually and as representatives of all)
others similarly situated,)

Plaintiffs,)

vs.)

NEW ENGLAND COMPOUNDING)
PHARMACY INC. D/B/A NEW ENGLAND)
COMPOUNDING CENTER, AMERIDOSE, LLC,)
ALAUNUS PHARMACEUTICAL, LLC,)
MEDICAL SALES MANAGEMENT INC.,)
GREGORY CONIGLIARO, BARRY J. CADDEN,)
LISA CONIGLIARO CADDEN, DOUGLAS)
CONIGLIARO, CARLA CONIGLIARO, and)
GLENN A. CHIN,)

Defendants.)

Civil Action No: 1:12-cv-12112

**MEMORANDUM OF LAW IN SUPPORT OF ASSENTED TO MOTION FOR AN
EXTENSION OF TIME TO MARCH 31, 2013 TO ANSWER THE PLAINTIFFS'
AMENDED COMPLAINT**

NOW COME defendants Gregory Conigliaro, Barry J. Cadden, Lisa Conigliaro Cadden, Douglas Conigliaro, Carla Conigliaro, and Glenn A. Chin (collectively, "Defendants") and move this Court for an extension of time to March 31, 2013 for Defendants to answer the Plaintiffs' Amended Complaint. In support of the motion, Defendants state as follows:

1. On or about November 13, 2012, this action was filed in this Court.
2. On or about November 19, 2012, the Plaintiffs filed an Amended Complaint.
3. Plaintiffs and Defendants have agreed that the Defendants' answer to the

Plaintiffs' Amended Complaint will be due by March 31, 2013, as Defendants' counsel requires

additional time in order to evaluate the allegations in the Amended Complaint and prepare a full and adequate response on behalf of each Defendant.

4. Defendants are not seeking an extension to unduly prolong these proceedings and no prejudice will result to any party by extending the deadline as requested.

5. Plaintiffs, through their counsel, have assented to this Motion.

Respectfully submitted,

Defendants Gregory Conigliaro, Barry J. Cadden, Lisa
Conigliaro Cadden, Douglas Conigliaro, Carla
Conigliaro, and Glenn A. Chin,

By their Attorneys,

/s/ Daniel E. Tranen

Geoffrey M. Coan, BBO # 641998

Daniel E. Tranen, BBO # 675240

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Date: January 24, 2013

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

In accordance with Local Rule 7.1(a)(2), I, Garrett D. Lee, do hereby certify that I conferred with Plaintiffs' counsel regarding Defendants' Assented To Motion for an Extension of Time to March 31, 2013 to Answer the Plaintiffs' Amended Complaint.

Dated: January 24, 2013

/s/ Garrett D. Lee

Garrett D. Lee

CERTIFICATE OF SERVICE

I, Daniel E. Tranen, hereby certify that on January 24, 2013, the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Daniel E. Tranen
Daniel E. Tranen